

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANTHONY ZARA,

Plaintiff,

v.

DEVRY EDUCATION GROUP, INC.;  
DEVRY MEDICAL INTERNATIONAL,  
INC.; ROSS UNIVERSITY SCHOOL OF  
MEDICINE, SCHOOL OF VETERINARY  
MEDICINE (ST. KITTS) LIMITED; and  
ALEXA FERRARI

Defendants.

Case No. 1:16-cv-05156

Honorable Judge Andrea R. Wood  
Magistrate Judge Sidney Schenkier

**DECLARATION OF AUDREY B. KAPLAN**

I, AUDREY B. KAPLAN, declare under penalty of perjury that the following statements are true:

1. I am currently employed by DeVry Education Group Inc. (DVG) as a lawyer in the Legal Department.
2. DVG is incorporated under the laws of the State of Delaware.
3. In mid-May 2016, after this lawsuit was filed, I spoke with Mr. Zara's attorney, Jason Bach.
4. Mr. Bach and I have negotiated the resolution of student claims in the past, and I engaged in this telephone conversation to see if this lawsuit also could be amicably resolved.
5. At the beginning of our call, I told Mr. Bach that the discussion was a protected settlement discussion.
6. At no time during my call with Mr. Bach call did I say that DVG made the decision to expel Mr. Zara.

7. My statements in this declaration are based on my own personal knowledge.

Executed this 30th day of June in Chicago, Illinois.

s/Audrey B. Kaplan

Audrey B. Kaplan